

# **Plaintiffs' Exhibit 2**

USA v  
GOOGLEChris LaSala  
August 16, 2023

1

1  
2 UNITED STATES DISTRICT COURT  
3 FOR THE EASTERN DISTRICT OF VIRGINIA

4 -----X  
5 UNITED STATES OF AMERICA, et al.,

6  
7 PLAINTIFF,

8  
9 -against-

10  
11 GOOGLE LLC,

12  
13 DEFENDANT.

14  
15 Civil 1:23-cv-00108

16 -----X

17  
18 UNITED STATES DISTRICT COURT  
19 SOUTHERN DISTRICT OF NEW YORK

20  
21 -----X  
22 In Re Google Digital Advertising Antitrust  
23 Litigation

24  
25 1:21-MD-3010 (S.D.N.Y.)

-----X

DEPOSITION OF CHRIS LASALA

Trumbull, Connecticut

Wednesday, August 16, 2023

Reported by:

Rebecca Schaumloffel, RPR, CLR

JOB #: 2023-906726

TIME: 7:10 a.m. Eastern

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1 **C. LASALA**  
 2 **discuss this deposition with anyone?**  
 3 A. Only my wife. Not the details of  
 4 it, but that this is what I'm doing for two  
 5 days.  
 6 **Q. You did not discuss the substance**  
 7 **of today's deposition with your wife?**  
 8 A. No.  
 9 **Q. Besides documents provided by your**  
 10 **attorney, did you review any documents to**  
 11 **prepare for this deposition?**  
 12 A. No.  
 13 **Q. Besides your attorney, have you**  
 14 **discussed the United States case against**  
 15 **Google with anyone?**  
 16 A. No.  
 17 **Q. Including anyone at Google?**  
 18 A. No.  
 19 **Q. Did you take any other steps to**  
 20 **prepare for today's deposition?**  
 21 A. No.  
 22 **Q. I want to turn now, Mr. LaSala, to**  
 23 **your employment history without retreading**  
 24 **too much ground from the last deposition.**  
 25 **At the time of your prior**

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1 **C. LASALA**  
 2 **deposition, October 2020, you were the global**  
 3 **product lead or global strategy lead; is that**  
 4 **correct?**  
 5 A. Yes.  
 6 **Q. And it looks like, based on your**  
 7 **resume that we found, your official title was**  
 8 **managing director, global commercialization**  
 9 **for publisher advertising products; is that**  
 10 **correct?**  
 11 A. Yes.  
 12 **Q. And you held that title for the**  
 13 **period of 2013 through 2022?**  
 14 A. I don't recall, but it sounds  
 15 reasonable.  
 16 **Q. In that role, you and the team you**  
 17 **oversaw were responsible for taking feedback**  
 18 **from Google sales teams through the**  
 19 **go-to-market teams and bringing that to**  
 20 **Google's engineering teams and product teams?**  
 21 A. Yes.  
 22 **Q. In that role, how many times, on**  
 23 **average, did you meet with publishers each**  
 24 **year?**  
 25 A. Less frequently than -- I don't

Page 15

1 **C. LASALA**  
 2 know, five to ten, maybe.  
 3 **Q. On average, how many times per**  
 4 **year in that role did you meet with**  
 5 **advertisers?**  
 6 A. Hardly ever. Maybe never.  
 7 **Q. I think in your prior deposition,**  
 8 **Mr. LaSala, you said you probably hadn't**  
 9 **spoken to an advertiser in 15 years.**  
 10 **Does that still sound accurate?**  
 11 A. Probably, yeah.  
 12 **Q. You and your team were also**  
 13 **responsible for taking whatever Google's**  
 14 **product teams decide to build and bringing**  
 15 **that back to Google's sales team; is that**  
 16 **correct?**  
 17 A. That's correct.  
 18 **Q. Are you still in the managing**  
 19 **director of global commercialization for**  
 20 **publisher advertising products role?**  
 21 A. No, I'm not.  
 22 **Q. And when did you -- when did you**  
 23 **leave that role?**  
 24 A. I think officially, left Google on  
 25 January 15th of -- what is it, '01, '02?

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1 **C. LASALA**  
 2 '02. About a year and a half ago.  
 3 **Q. Okay. So you left Google in**  
 4 **around January 15, 2022?**  
 5 A. I should know this, but it's been  
 6 that long -- I think it's been that long. It  
 7 wasn't on LinkedIn.  
 8 **Q. Understood.**  
 9 **I think that's good enough, thank**  
 10 **you?**  
 11 A. Okay.  
 12 **Q. Why did you leave Google?**  
 13 A. I've always wanted to sort of  
 14 pivot my career into education and I -- it  
 15 was just a good opportunity to do so. I  
 16 thought, you know, if not then -- if not now,  
 17 when, you know -- in my, you know, 50s,  
 18 and -- I don't know, COVID. A lot going on  
 19 and I just thought life is too short.  
 20 And I have been an adjunct  
 21 professor at Duke University for five or six  
 22 years. I was a -- I did some other things  
 23 with higher education, different schools, and  
 24 it was just time. It was just time.  
 25 **Q. The opportunity that you just**

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1 C. LASALA  
 2 they get access to new inventory.  
 3 **Q. And the team working on GDN**  
 4 **determined it was in advertisers' interest to**  
 5 **buy inventory outside of AdX, right?**  
 6 A. You'd have to ask them. But  
 7 presumably, yes.  
 8 **Q. Any reason to doubt that that's**  
 9 **accurate?**  
 10 A. No.  
 11 **Q. Not all inventory is available on**  
 12 **AdX, right?**  
 13 A. I don't know, but I assume no.  
 14 **Q. In your consideration of sales**  
 15 **requests to discount the 20 percent AdX**  
 16 **revenue share fee, did you ever consider**  
 17 **whether GDN was exclusive to AdX or buying on**  
 18 **other exchanges?**  
 19 A. Yeah. Weighing the decision, no.  
 20 In the decision to -- in those GPX decisions,  
 21 not that I recall.  
 22 So, again, the short-term versus  
 23 long-term discussion. The short-term, it was  
 24 whatever the sales conversations we were  
 25 having.

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1 C. LASALA  
 2 **Q. In evaluating a sales request to**  
 3 **discount the AdX 20 percent fee, you don't**  
 4 **recall any discussions about GDN being**  
 5 **exclusive to AdX?**  
 6 A. I don't recall.  
 7 **Q. You don't recall whether those**  
 8 **conversations happened or you don't recall**  
 9 **ever discussing GDN --**  
 10 A. I don't recall if the conversation  
 11 happened.  
 12 **Q. Okay.**  
 13 A. Or if we discussed that.  
 14 **Q. Going back to competitor pressure,**  
 15 **you would agree with me that Google did not**  
 16 **seek competitive pressure on AdX's prices**  
 17 **because if publishers wanted access to GDN**  
 18 **demand, they had to pay the 20 percent fee to**  
 19 **access that, via AdX?**  
 20 MR. BIAL: Object to form.  
 21 And you might want to break that  
 22 up a little bit or slow down. I  
 23 couldn't follow it either.  
 24 A. Just repeat the question, please.  
 25 **Q. Sure. Sure. If a publisher**

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1 C. LASALA  
 2 **wanted access to GDN demand --**  
 3 A. Yes.  
 4 **Q. -- did it have to make its**  
 5 **public -- its inventory available via AdX?**  
 6 A. No, not always.  
 7 **Q. Prior to, say, 2015?**  
 8 A. I don't know, in that decision,  
 9 GDN made. But prior to the decision -- I  
 10 think, prior to the decision by the GDN team  
 11 to buy in other exchanges, I think that's  
 12 true.  
 13 **Q. Okay. And if a publisher wanted**  
 14 **access to GDN demand via AdX, it had to pay**  
 15 **the 20 percent fee, right?**  
 16 A. They had to pay whatever the  
 17 negotiated fee was, yes, or 20 percent rate  
 18 card.  
 19 **Q. Is one of the reasons why Google**  
 20 **did not see competitive pressure on AdX's**  
 21 **20 percent fee, because publishers had to use**  
 22 **AdX to access GDN demand?**  
 23 A. It's possible. But when GDN  
 24 started buying in other demand sources, it  
 25 didn't change. Certain market dynamics

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1 C. LASALA  
 2 didn't change. So it's hard to say.  
 3 I mean, I would have thought that  
 4 to be the case, and then was proven wrong,  
 5 essentially.  
 6 **Q. Well, we discussed earlier that**  
 7 **most GDN demand still buys on AdX, right?**  
 8 A. Yeah. How they decide to bid and  
 9 when is up to them. That's not -- like, I  
 10 don't control that.  
 11 **Q. You don't have any reason to**  
 12 **believe that all GDN demand is available on**  
 13 **every exchange, right?**  
 14 A. I don't know what the GDN team has  
 15 decided in terms of where they bid. And so  
 16 they are a buyer, like any other buyer, and  
 17 they have to make independent decisions on  
 18 what inventory they buy and to what  
 19 exchanges.  
 20 **Q. Putting aside the decisions that**  
 21 **the GDN team made, was it your understanding**  
 22 **that all GDN demand was available through**  
 23 **non-Google exchanges?**  
 24 A. Not all exchanges.  
 25 **Q. How about taking all the exchanges**

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1 **C. LASALA**  
 2 **together, was all GDN demand available**  
 3 **through all -- a combination of all the other**  
 4 **ad exchanges?**  
 5 A. My understanding is, no, but I  
 6 don't know for sure.  
 7 **Q. Was a majority of GDN demand even**  
 8 **available through all the other exchanges?**  
 9 A. I don't think so.  
 10 **Q. Okay. So if a publisher wanted**  
 11 **access to the majority of GDN demand, they**  
 12 **still had to make their inventory available**  
 13 **via AdX, correct?**  
 14 A. Yeah, at certain -- particularly  
 15 early on, and then, yes.  
 16 **Q. And to make your -- for a**  
 17 **publisher to make their inventory available**  
 18 **via AdX, they had to pay the 20 percent**  
 19 **revenue share fee?**  
 20 A. If -- yeah, if they chose to, or  
 21 the negotiated fee, right.  
 22 **Q. And Google rarely discounted that**  
 23 **20 percent AdX revenue share fee, correct?**  
 24 A. Yes.  
 25 **Q. Okay. Just a couple of clarifying**

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1 **C. LASALA**  
 2 **questions on GDN.**  
 3 **GDN is owned by Google, right?**  
 4 A. Yes.  
 5 **Q. And AdX is owned by Google?**  
 6 A. Yes.  
 7 **Q. And GDN is a buyer --**  
 8 A. Yes.  
 9 **Q. -- a single buyer on AdX?**  
 10 **That's a yes?**  
 11 A. Yes.  
 12 **Q. And GDN, though, in turn,**  
 13 **represents many advertisers, correct?**  
 14 A. Yes.  
 15 **Q. Okay. In the past, have you**  
 16 **predicted what would happen if GDN freely**  
 17 **bought publisher inventory on non-Google ad**  
 18 **exchanges?**  
 19 MR. BIAL: Object to form. Lack  
 20 of foundation.  
 21 **Q. You can answer.**  
 22 A. Yeah, sure. So I have a  
 23 perspective that I don't know if it's  
 24 necessarily in the best interest of the  
 25 ecosystem. So I -- we have this, sort of,

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1 **C. LASALA**  
 2 ongoing debate on whether we were first and  
 3 foremost, like, a network. So Google started  
 4 AdSense as a network business. It's, like,  
 5 very contained. Complete control over how  
 6 buyers bought on AdSense network.  
 7 And I don't know if you're  
 8 familiar with the AdSense network, and its  
 9 incarnation, but it was, sort of, a very  
 10 effective model that worked for advertisers  
 11 that had unspent demand and marketing  
 12 objectives and publishers that had inventory  
 13 that they needed to sell. Some remnant and  
 14 some not remnant, but a lot of remnant.  
 15 And then the business evolved,  
 16 long before -- like, I wasn't even part of  
 17 that business. And then I became part of the  
 18 business.  
 19 And then part of my job was to sit  
 20 down and we worked with publishers, broadly,  
 21 in its broadest term. Like, we used the term  
 22 "publisher," but it meant any content,  
 23 creative content, whether it was a video  
 24 content, or app content, or commerce-related  
 25 content, publishers of all different walks of

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1 **C. LASALA**  
 2 life and different business. And all of a  
 3 sudden, we were playing in all of this space.  
 4 And my job was to go listen to all of our  
 5 sales teams in different regions and  
 6 different customers, types, and say, what do  
 7 you want? And then they would tell me. They  
 8 want this, they want that, and this customer  
 9 wants that. And we had to build this complex  
 10 model to meet the needs of some pretty  
 11 complex customers.  
 12 So when we sat down to say,  
 13 usually -- sometimes, like I said before,  
 14 once a year, twice a year, four times a  
 15 year -- what are we going to build? Are we  
 16 going to build this or this?  
 17 We didn't have, like, a really  
 18 good framework for making this prioritization  
 19 decisions. So it became tough to say, you  
 20 know, we build for this and we don't build  
 21 for this.  
 22 So I constantly pushed the  
 23 thinking of the team to say, like, what are  
 24 we first and foremost? Like, what are we  
 25 really trying to do? What's our objective?

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1 **C. LASALA**  
 2 **at Google, right?**  
 3 A. Not on a regular basis.  
 4 **Q. Ten to 15 times a year?**  
 5 A. I don't know that I said that  
 6 high, but, yes, a couple of times -- a few  
 7 times a year. Ten-ish, whatever.  
 8 **Q. And you were responsible for the**  
 9 **team that tracked competitive options or the**  
 10 **competitive landscape; is that right?**  
 11 A. Yes. I was responsible for a team  
 12 that worked with teams that did that, the  
 13 go-to-market teams. Mainly were responsible  
 14 for understanding and having their finger on  
 15 the pulse of what the competitive  
 16 environment. They would -- go-to-market  
 17 teams would summarize it from AMIA and Asia,  
 18 and Latin America, and the U.S., and then  
 19 they would share it with our teams.  
 20 **Q. So the go-to-market teams that had**  
 21 **their pulse on the competitive environment,**  
 22 **they reported to you, right?**  
 23 A. No.  
 24 **Q. They did not?**  
 25 A. No.

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1 C. LASALA  
 2 **Q. The go-to-market team never**  
 3 **provided you with any kind of reports?**  
 4 MR. BIAL: Object to form.  
 5 A. You asked if they reported to me.  
 6 They did not report to me hierarchically.  
 7 They shared information with my  
 8 team, and my team did stuff with that  
 9 information. So it would be an illusion  
 10 that, like, I was scouring through all of  
 11 these different competitive reports. It's  
 12 not consistent with my job description.  
 13 **Q. Okay.**  
 14 A. I was a manager.  
 15 **Q. So the go-to-market team that was**  
 16 **responsible for having their pulse on**  
 17 **competitive market provided information about**  
 18 **the market to your team?**  
 19 A. Correct.  
 20 **Q. Did they also provide information**  
 21 **directly to you?**  
 22 A. It's reasonable to think they sent  
 23 it to me. Whether I digested it in detail  
 24 is --  
 25 **Q. And they sent this information to**

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1 **C. LASALA**  
 2 **your team because it was related to Google's**  
 3 **strategic decision-making.**  
 4 **Is that fair?**  
 5 A. I think it's just common practice  
 6 to understand what your competitors are  
 7 doing. So it was just the best practice.  
 8 **Q. Would you make decisions based on**  
 9 **what your competitors were doing at Google?**  
 10 A. That wasn't really Google's MO.  
 11 We really made decisions based on what we  
 12 thought customers needed. And, like, largely  
 13 I think the culture of the company was not to  
 14 worry too much about what the customer --  
 15 excuse me, what the competition was doing,  
 16 but build for the future, not build for the  
 17 past or your competition, so...  
 18 **Q. So at least in the ordinary course**  
 19 **of business, you wouldn't look at new**  
 20 **features that competitors were launching in**  
 21 **the market?**  
 22 A. We would look at what our  
 23 competitors do. And you asked if we made  
 24 strategic decisions solely based on what  
 25 competitors are doing. And it's one input

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1 C. LASALA  
 2 into a variety of inputs.  
 3 **Q. Okay. But what competitors are**  
 4 **doing in the marketplace is an input in**  
 5 **strategic decision-making at Google, right?**  
 6 A. I think that's fair. Yeah.  
 7 **Q. And so you had some general**  
 8 **awareness of the competitive landscape when**  
 9 **making or recommending strategic decisions?**  
 10 A. I think that's -- I think that's  
 11 fair.  
 12 **Q. Okay. And as part of the**  
 13 **information you received in your role, did**  
 14 **you understand that DSP was the de facto**  
 15 **preferred ad server of choice for publishers?**  
 16 A. I don't know that I could speak to  
 17 what is de facto or preferred on behalf of a  
 18 publisher. I can say to you that it was  
 19 used. Publishers signed up and liked the  
 20 product.  
 21 **Q. And it was used by most**  
 22 **publishers, right?**  
 23 A. I don't know you define "most,"  
 24 but it was used by lots of publishers.  
 25 **Q. Any reason to think less than 50**



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1 **C. LASALA**  
 2 **percent of all large publishers used DFP?**  
 3 MR. BIAL: Objection. Lack of  
 4 foundation.  
 5 A. It is, like, a definitional  
 6 problem. So I don't know how many publishers  
 7 and whether the large ones or the small ones  
 8 used it.  
 9 **Q. Did you receive reports on which**  
 10 **publisher ad servers were used by large**  
 11 **publishers?**  
 12 A. Probably.  
 13 **Q. Based on that reporting, are you**  
 14 **aware of any publisher ad server that was**  
 15 **used more by large publishers than DFP?**  
 16 A. I don't recall, no.  
 17 **Q. Okay. Isn't it true that**  
 18 **90 percent of open web publishers used DFP in**  
 19 **2015?**  
 20 MR. BIAL: Objection. Lack of  
 21 foundation.  
 22 A. I don't know what the number -- I  
 23 don't recall what the number is, or what an  
 24 open web publisher is either. I don't know  
 25 -- I don't even know what an open web

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1 C. LASALA  
 2 publisher is.  
 3 **Q. Are you familiar with the term**  
 4 **"walled garden"?**  
 5 A. I am.  
 6 **Q. What's "walled garden"?**  
 7 A. A large media property that -- how  
 8 do I describe a walled garden?  
 9 Where you, essentially -- I don't  
 10 know. Familiar with it. Like, the best way  
 11 to describe it as an example. Like, we  
 12 consider Facebook, like, a walled garden. So  
 13 all of the data goes into Facebook and all of  
 14 the buying happens in Facebook, and then --  
 15 and that's it.  
 16 There is no other -- there is no  
 17 other way to, sort of, buy the inventory.  
 18 Maybe that's it, there is no other way to buy  
 19 the inventory within Facebook. You go to  
 20 Facebook, it's walled garden. I think that's  
 21 probably the way to describe it.  
 22 **Q. And Facebook uses its own**  
 23 **proprietary ad tech tools to sell advertising**  
 24 **on Facebook?**  
 25 A. Right, on its Facebook property.

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1 C. LASALA  
 2 Yeah. That's a good description of it.  
 3 **Q. Did Google ever try to sell**  
 4 **Google's ad tech products to Facebook for**  
 5 **advertising on Facebook?**  
 6 A. Did we try to buy Facebook's  
 7 inventory?  
 8 **Q. No, no, no.**  
 9 **Did Google ever try to sell to**  
 10 **Facebook Google's ad tech products to be used**  
 11 **to advertise on Facebook?**  
 12 A. I'm sorry, I don't understand the  
 13 question.  
 14 **Q. Yeah.**  
 15 A. Like, rephrase it.  
 16 **Q. Thinking of Facebook for a moment**  
 17 **as a publisher, did Google ever try to**  
 18 **convince Facebook to use Google's Ad Tech**  
 19 **tools to sell advertising on Facebook?**  
 20 A. I don't know, actually.  
 21 **Q. Okay. Based on the reports you**  
 22 **did receive about the competitive landscape**  
 23 **related to publisher ad servers, any reason**  
 24 **to think it's not true that 90 percent of**  
 25 **large publishers use DFP?**

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1 **C. LASALA**  
 2 MR. BIAL: Object to form.  
 3 A. No reason to think it's not true.  
 4 **Q. Okay. Can you think of any**  
 5 **publisher ad server today that's used by more**  
 6 **publishers than DFP?**  
 7 A. No.  
 8 MR. BIAL: Objection.  
 9 **Q. Okay. There are a number of**  
 10 **advantages that come from being the de facto**  
 11 **ad server of choice; isn't that right?**  
 12 MR. BIAL: Objection. Objection  
 13 to form.  
 14 A. I don't know, what are the  
 15 advantages?  
 16 **Q. Are there advantages to being**  
 17 **publishers' preferred ad server?**  
 18 A. I don't know what you're -- what  
 19 you're getting at.  
 20 **Q. Assuming DFP is the preferred**  
 21 **advertise -- ad server of choice for**  
 22 **publishers, are there certain advantages with**  
 23 **having that market position?**  
 24 A. Advantages to whom?  
 25 **Q. To Google.**

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1 **C. LASALA**  
2 **GDN win the AdX auction, or an authorized**  
3 **buyer wins it, you don't capture the buy-side**  
4 **margin; is that right?**  
5 MR. BITTON: Objection to form.  
6 A. I guess, yeah, if it's a non-DV3  
7 buyer. DV3 is, like, practically not even in  
8 the mix, so they couldn't profit from it.  
9 **Q. And when it's a -- not GDN that**  
10 **wins in the AdX auction; is that right?**  
11 A. A GDN --  
12 MR. BITTON: Objection to form.  
13 THE COURT REPORTER: Sorry, I  
14 don't have an answer.  
15 MR. MADDEN: I know. I'm going  
16 to rephrase.  
17 BY MR. MADDEN:  
18 **Q. GDN and DV3 are both AdX buyers,**  
19 **right?**  
20 A. Yes.  
21 **Q. And there are non-Google entities**  
22 **that are also authorized AdX borrowers --**  
23 A. Yes.  
24 **Q. -- buyers, right?**  
25 A. Yes.

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1 C. LASALA  
2 **Q. And so when an authorized buyer --**  
3 **strike that.**  
4 **If I use the term "authorized**  
5 **buyer," would you understand me to mean a**  
6 **non-Google buyer in the AdX auction?**  
7 A. An authorized buyer would include  
8 GDN and DV3.  
9 **Q. Okay. So when I use the term**  
10 **"non-Google authorized buyer," would you**  
11 **understand me to refer to a third party**  
12 **authorized buyer in the AdX auction?**  
13 A. Yes, thank you for clarifying.  
14 **Q. Okay. So when a non-Google**  
15 **authorized buyer wins the AdX auction, Google**  
16 **only captures the sell-side rev share; is**  
17 **that correct?**  
18 A. That's correct.  
19  
20  
21 (Continued on next page to include  
22 jurat.)  
23  
24  
25

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1 C. LASALA  
2  
3 MR. MADDEN: Can we take a  
4 five-minute break? I'm done with --  
5 You can put the document aside.  
6 We can go off the record.  
7 THE VIDEOGRAPHER: The time is  
8 4:54 p.m. We are off the record.  
9 (Whereupon, at 4:54 p.m., the  
10 Examination of this Witness was  
11 adjourned.)  
12  
13  
14  
15  
16  
17  
18  
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\_\_\_\_\_  
CHRIS LASALA

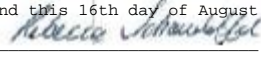
Subscribed and sworn to before me  
this \_\_\_\_\_ day of \_\_\_\_\_, 2023.

\_\_\_\_\_  
NOTARY PUBLIC

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1  
2 E X H I B I T S  
3  
4  
5 EXHIBIT EXHIBIT PAGE  
6 NUMBER DESCRIPTION  
7 Exhibit 1 GOOG-AT-MDL-007344222 248  
8 through '4225  
9 Exhibit 2 GOOG-DOJ-AT-01019463 351  
10 through '9468  
11 Exhibit 3 GOOG-DOJ-09876316 401  
12 through '6329  
13  
14  
15  
16 I N D E X  
17  
18 EXAMINATION BY PAGE  
19  
20 MR. TESLICKO 5  
21 MR. MADDEN 397  
22  
23  
24  
25



1  
 2 C E R T I F I C A T E  
 3  
 4 STATE OF NEW YORK )  
 : SS.:  
 5 COUNTY OF NASSAU )  
 6  
 7 I, REBECCA SCHAUMLOFFEL, a Notary  
 8 Public for and within the State of New York,  
 9 do hereby certify:  
 10 That the witness whose examination  
 11 is hereinbefore set forth was duly sworn and  
 12 that such examination is a true record of the  
 13 testimony given by that witness.  
 14 I further certify that I am not  
 15 related to any of the parties to this action  
 16 by blood or by marriage and that I am in no  
 17 way interested in the outcome of this matter.  
 18 IN WITNESS WHEREOF, I have hereunto  
 19 set my hand this 16th day of August, 2023.  
 20   
 21 REBECCA SCHAUMLOFFEL  
 22  
 23  
 24  
 25

1 ERRATA SHEET FOR THE TRANSCRIPT OF:  
 2 Case Name: US v. Google/In Re Google Digital Advertising  
 3 Antitrust Litigation  
 4 Dep. Date: August 16, 2023  
 5 Deponent: Chris LaSala  
 6 CORRECTIONS:  
 7 Pg. Ln. Now Reads Should Read Reason  
 8 — — — — —  
 9 — — — — —  
 10 — — — — —  
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 19 Signature of Deponent  
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 21 SUBSCRIBED AND SWORN BEFORE ME  
 22 THIS \_\_\_\_ DAY OF \_\_\_\_\_, 2023.  
 23  
 24 \_\_\_\_\_  
 25 (Notary Public) MY COMMISSION EXPIRES: \_\_\_\_\_